

Attorneys Listed on Signature Page

\*E-FILED - 2/21/08\*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,

Plaintiff,

v.

HYNIX SEMICONDUCTOR INC., HYNIX  
SEMICONDUCTOR AMERICA INC., HYNIX  
SEMICONDUCTOR MANUFACTURING  
AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC.,  
SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION,  
NANYA TECHNOLOGY CORPORATION  
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

**STIPULATION AND []  
ORDER REGARDING USE OF  
OKI CONFIDENTIAL  
INFORMATION**

Trial Date: January 29, 2008

Judge: Hon. Ronald M. Whyte

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RAMBUS INC.,  Plaintiff,  vs.  MICRON TECHNOLOGY, INC., and MICRON SEMICONDUCTOR PRODUCTS, INC.,  Defendants.
HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR AMERICA INC., HYNIX SEMICONDUCTOR MANUFACTURING AMERICA INC.,  Plaintiffs,  vs.  RAMBUS INC.,  Defendant.

CASE NO. C 06-00244 RMW

CASE NO. C 00-20905 RMW

1 WHEREAS defendant Rambus Inc. ("Rambus") has entered into two licensing  
2 agreements ("the Licenses") with Oki Electric Industry Co., Ltd. ("Oki"), regarding Oki's use of  
3 certain Rambus SDR and DDR SRAM products, along with their associated memory modules  
4 and controllers ("the Rambus products");

5 WHEREAS Oki has paid royalties to Rambus based on sales of Oki products  
6 pursuant to the Licenses;

7 WHEREAS Oki represents that the actual amounts Oki has paid to Rambus  
8 pursuant to the Licenses (but not the royalty rates) and the actual volume of Oki's sales relevant  
9 to the Licenses represent confidential and proprietary business information ("the Oki Confidential  
10 Information"); and

11 WHEREAS Oki represents that public disclosure of the Oki Confidential  
12 Information in the present proceedings would lead to serious competitive harm to Oki;

13 THEREFORE, IT IS STIPULATED AND ORDERED THAT in the event that  
14 any party (an "Introducing Party") seeks to introduce into the record at trial any exhibit, whether  
15 substantive or demonstrative, containing any Oki Confidential Information, the Introducing Party  
16 will request that the Court admit such exhibit into evidence under seal and take any other  
17 measures necessary to preserve the confidentiality of the Oki Confidential Information. The  
18 Introducing Party will request that such exhibit not become part of the public record. The  
19 Introducing Party will also request that such exhibit shall not be displayed in such a manner that  
20 its contents are visible from the public gallery in the Courtroom. All other parties agree to  
21 support and to not oppose the Introducing Party's request.

1                   **SO ORDERED.**

2  
3   DATED: 2/21/08

  
Hon. Ronald M. Whyte

4   Dated: February 8, 2008

MUNGER, TOLLES & OLSON LLP

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6  
7   By: /s/ Keith R. D. Hamilton

8           Gregory P. Stone  
9           Steven M. Perry  
10          Peter A. Detre  
11          Keith R. D. Hamilton  
12          Counsel for Plaintiff RAMBUS INC.

13  
14  
15   Dated: February 8, 2008

QUINN EMANUEL URQUHART OLIVER  
& HEDGES

16   By: /s/ Aaron Craig

17           Harold A. Barza  
18           William Price  
19           Aaron Craig

20           Coordinating Counsel for the Manufacturers  
21           Hynix Semiconductor, Inc., *et al.*

22   ACCEPTED AND AGREED TO:

23           BERGESON, LLP, counsel for Oki Electric  
24           Industry Co., Ltd.

25   By: /s/ Melinda M. Morton

26           Melinda M. Morton

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Filer's Attestation:

I, Keith R. D. Hamilton, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING USE OF OKI CONFIDENTIAL INFORMATION**. In compliance with General Order 45.X.B, I hereby attest that the other parties to the action concur in this filing.

By: /s/ Keith R. D. Hamilton

Keith R. D. Hamilton